

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
Southern Division**

BISHOP & HAYES, PC,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 23-CV-03283-MDH
)	
JAGUAR LAND ROVER NORTH)	
AMERICA, LLC,)	
)	
<i>Defendant.</i>)	
_____)	

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE ANSWER**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendant Jaguar Land Rover North America, LLC (“JLRNA”) moves this Court for a 30-day extension, until October 13, 2023, to file its answer to Plaintiff’s Complaint, and in support thereof states as follows:

1. On July 7, 2023, Plaintiff Bishop & Hayes, PC (“Plaintiff”), individually, and on behalf of all others similarly situated nationwide, filed a putative class action complaint (the “Complaint”) against JLRNA in the Circuit Court of the of Greene County, Missouri, Case No. 2331-CC00744 (the “State Court Action”).
2. The Complaint and summons were served on JLRNA on August 8, 2023.
3. JLRNA timely removed the State Court Action to this Court on September 6, 2023 pursuant to the Class Action Fairness Act of 2005. *See* Dkt. No. 1.
4. Pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), JLRNA’s answer deadline currently is September 13, 2023.
5. JLRNA and Plaintiff have agreed to extend JLRNA’s answer deadline 30 days until October 13, 2023 for the purposes of determining if the matter can be resolved on an

individual basis, to evaluate venue issues and whether transfer under 28 USC § 1404 is appropriate, and to evaluate potential defenses.

6. This is JLRNA's first request for extension of time.
7. There is no objection to the extension by counsel for Plaintiff.
8. This motion is not made for the purpose of delay, and no party will be prejudiced by this extension.

WHEREFORE, Defendant Jaguar Land Rover North America, LLC prays that its Motion to extend the answer deadline be GRANTED.

September 7, 2023

Respectfully submitted,

By: /s/ Stephen M. Strum
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Attorneys for Defendant Jaguar Land Rover North America, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of September, 2023, I caused a true and correct copy of the foregoing to be served on all counsel of record below via electronic mail.

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/s/ Stephen M. Strum

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